IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, et al.,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
VS.)	NO. 08 C 2814
)	
AMERICAN CHUTE SYSTEMS, INC.,)	JUDGE SAMUEL DER-YEGHIAYAN
an Illinois corporation,)	
)	
Defendant.)	

NOTICE OF MOTION

TO: Mr. Frank E. Stephens, Registered Agent/President

American Chute Systems, Inc. 603 E. Washington Street

Joliet, IL 60433

YOU ARE HEREBY NOTIFIED that on **Thursday**, the **26th** day of **June 2008** at **9:00 a.m.**, or as soon thereafter as counsel can be heard, we shall appear before the Honorable Samuel Der-Yeghiayan, Judge of the United States District Court for the Northern District of Illinois, Eastern Division, in Courtroom 1903, 219 South Dearborn Street, Chicago, IL, and then and there present Plaintiffs' Motion for Entry of Default and Judgment. A copy of said motion is hereby served upon you.

/s/	Beverl	y P. Alfon

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Notice of Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 19th day of June 2008:

Mr. Frank E. Stephens, Registered Agent/President American Chute Systems, Inc. 603 E. Washington Street Joliet, IL 60433

/s/ Beverly P. Alfon

Beverly P. Alfon Attorney for Plaintiffs BAUM SIGMAN AUERBACH & NEUMAN, LTD. 200 West Adams Street, Suite 2200 Chicago, IL 60606-5231

Bar No.: 6274459

Telephone: (312) 236-4316 Facsimile: (312) 236-0241

E-Mail: balfon@baumsigman.com

I:\265J\American Chute\2008\notice of motion.bpa.df.wpd